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10 *Attorney for Defendant, Bank of America, N.A.*

11  
12 **UNITED STATES DISTRICT COURT**  
13  
14 **DISTRICT OF NEVADA**

15 HANIT OHAION,

16 Plaintiff,

17 v.

18 EQUIFAX INFORMATION SERVICES,  
19 LLC, AND BANK OF AMERICA, N.A.,

20 Defendants.

Case No. 2:21-CV-02198-GMN-BNW

**UNOPPOSED MOTION TO EXTEND  
TIME TO RESPOND TO PLAINTIFF'S  
COMPLAINT**

**(Second Request)**

21 Defendant Bank of America N.A. ("BANA") by and through its undersigned counsel of  
22 record, hereby submits the following Unopposed Motion to Extend Time to Respond to Plaintiff's  
23 Complaint (Second Request):

24 On December 14, 2021, Plaintiff filed his Complaint [ECF No. 1]. The Summons to  
25 Defendant was issued on December 14, 2021 [ECF No. 4] and purportedly served on December  
26 16, 2021.

27 On January 11, 2022, this Court entered its Order on BANA's Unopposed Motion to  
28 Extend Time to Respond to Plaintiff's Complaint (First Request), which extended the deadline for  
BANA to respond to the Complaint to February 7, 2022.

Plaintiff and BANA have discussed extending the current deadline an additional 15-days,  
while the parties continue to explore early settlement to avoid additional time, fees, and costs

1 associated with litigation. Plaintiff has approved the 15-day extension, which would make the new  
2 response deadline February 22, 2022.

3 Based upon the foregoing, BANA respectfully requests that the Court extend the deadline  
4 for BANA to file its response to Plaintiff's Complaint to February 22, 2022. This is the second  
5 request for extension of time for BANA to respond to Plaintiff's Complaint. The extension is  
6 requested in good faith and is not for purposes of delay or prejudice to any other party.

7  
8 Dated this 7<sup>th</sup> day of February, 2022.

9 WRIGHT, FINLAY & ZAK, LLP

10 /s/ Jory C. Garabedian

11 Darren T. Brenner, Esq.

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14 Nevada Bar No. 10352

15 7785 W. Sahara Ave., Suite 200

16 Las Vegas, Nevada 89117

17 *Attorneys for Bank of America, N.A.*

18 **IT IS SO ORDERED:**

19 

20 UNITED STATES MAGISTRATE JUDGE

21 DATED: February 8, 2022.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 7, 2022, and pursuant to Fed. R. Civ. P. 5(b), I served via the CM/ECF electronic filing system a true and correct copy of the foregoing **UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S COMPLAINT (Second Request)** to the parties below:

Robert M. Tzall  
Contemporary Legal Solutions PLLC  
2551 N. Green Valley Parkway  
Building C, Suite 303  
Henderson, NV 89014

/s/ Tonya Sessions  
An employee of Wright Finlay & Zak LLP